Centers for Medicare & Medicaid Services

Open Payments Bulk Data Upload Instructions

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Table of Contents

1   Introduction

Open Payments requires applicable manufacturers and applicable group purchasing organizations (GPOs) to report payments or other transfers of value and ownership and investments interests provided to covered recipients and physican owners or investors to CMS. The Open Payments system allows applicable manufacturers and applicable GPOs to submit payments or other transfer of value and ownership or investment interest via file uploads or manual entry.

Entities uploading information into the Open Payments system may use one of two acceptable formats: .XML or .CSV. Information pertaining to the use of these file types for data upload is listed in separate sections of this document.

Additionally, applicable manufacturers and applicable GPOs may enter payments or other transfers of value information manually through a Graphic User Interface (GUI).

Data submission to the Open Payment system can be done in one of two ways:

1. **Via File Upload (CSV or XML):** This is the recommended method for applicable manufacturers and applicable GPOs with large volumes of reportable data. Information pertaining to the use of the two file types for data upload is listed in separate sections of this document.

2. **Via Manual Data Entry:** In addition to bulk data upload, applicable manufacturers and applicable GPOs may enter payments or other transfers of value information manually through a Graphic User Interface (GUI). This method is recommended for applicable manufacturers and applicable GPOs with a small number of reportable transactions.

2   File Preparation and Upload Instructions

This section provides instructions for the preparation and upload of .XML or .CSV files for submission through the Open Payments system.

2.1 XSD Schema for .XML Files

The following instructions are described further:

- How to download the XSD schema and sample .XML files;

- How to create the .XML file; and

- How to upload an .XML file.

2.1.1 Download Instructions for XSD Schema and Sample .XML Files

To report payments or other transfers of value and ownership or investment interest using an .XML file, only one XML Schema Definition (XSD) is needed. This XSD is used to create and validate the .XML data submission file for all three reporting categories (Research, General, and Ownership and Investment Interests).

To successfully submit payments or other transfers of value and ownership or investment interests, applicable manufacturers and applicable GPOs need to ensure that their files comply with the published schema. The XSD schema for .XML file validation is named **PaymentsSubmission.xsd**. To assist in proper formatting, three .XML sample files for submitting Open Payments data are available for download:

- **General (Non-Research) Payments File.XML** – for all other payment submissions not otherwise covered under research agreements.

- **Research Payments File.XML** – for payment submissions associated with research agreements.

- **Owner Investor File.XML** – for ownership/investment information submissions.

Please refer to the Submission Data Mapping Document for the data elements, data element description, expected size and format, and data mapping to each XSD element in the three different payment reporting submissions. Instructions on downloading these files are given below.

2.1.2 Downloading the .XML File from the CMS Open Payments Website

The XML file for the required reporting categories can be downloaded from the [Data Submission and Attestion page](#) of the Open Payments website.

2.1.3 Downloading the .XML File from the Open Payments System

Currently the .XML file cannot be downloaded from the Open Payments system, as the system is not yet operational. Once the system becomes operational, the file can be downloaded through the following steps:

1. On the home page of the Open Payments system, click "Payments Overview."

2. On the right side of the Payments Overview Page:

a. Select the type of payments file; and

b. Click on "Download .XML Files" to begin downloading the Zip file. Save the Zip file to your desktop or a preferred location on your hard drive and then open it, rather than opening the file as it downloads.

2.1.4 .XML File Creation for Submission

The .XML files can be created using tools such as .XMLSpy or other programmatic interfaces using the XSD schema or by using the specified .XML file.

When using the XSD schema to generate the .XML file, the type of reporting category in the XSD determines the required contents of the submission file to be populated. The user will then select one of the following reporting category types:

- General (Non-Research) PaymentSubmissionType

- ResearchPaymentSubmissionType

- OwnershipPhysicianSubmissionType

Once all the required data elements are populated, the XSD schema can be used to validate the .XML file to ensure the file conforms to the expected values and data types. This minimizes errors after the .XML file is submitted in the Open Payments system.

2.1.5 Guidelines for .XML File Creation Using .XML Sample File

When entering data in the .XML sample files, follow these general guidelines:

1. Delete sample data in the three .XML sample files before populating with your entity's information. The structure of XML cannot be altered. Any alteration will result in file validation error.

2. Some of the data elements in the submission files are optional.

   a. If you do not intend to enter data for an optional data element, leave that field blank. DO NOT enter spaces, "Not Applicable," "N/A," etc.

3. For data elements that allow multiple entries, such as multiple state-licenses numbers etc., the .XML element is defined to have one or more occurrences.

   a. Only provide the required number of data values up to the maximum allowed occurrences.

4. If the file exceeds 250MB in size, please separate the data into multiple submissions to keep the file size under 250 MB.

5. **Save your file!**

   a. When done with entering the data, save the file as a .XML file.

   b. Please note that the .XML file name should be unique across submissions and not exceed 50 characters.

Note: For new submissions, the Resubmission File Indicator must be set to "N" in order to process the file successfully.

2.2 .CSV Files
The following instructions are described further in this section:

- How to download the sample .CSV files;

- How to create the .CSV file; and

- How to upload the .CSV file.

2.2.1 Download Instructions for .CSV file
There are three separate .CSV files available for download to be used when submitting Open Payments data:

- **General (Non-Research) Payments File.CSV** – for all other payments or other transfers of value submissions not otherwise covered under research agreements

- **Research Payments File.CSV** – for payments or other transfers of value submissions associated with research

- **Owner Investor File.CSV** – for ownership or investment interests submissions.

Please refer to the Submission Data Mapping Document on the Data Submission and Attestion page of the Open Payments website for the data elements, data element description, expected size and format, and data mapping to .CSV element in the three reporting categories.

2.2.2 Downloading the .CSV File from the CMS Open Payments Website
The .CSV file for the required reporting categories can be downloaded from the Data Submission and Attestion page of the Open Payments website.

2.2.3 Downloading the .CSV File from the Open Payments System
Currently the .CSV file cannot be downloaded from the Open Payments system, as the system is not yet operational. Once the system becomes operational, the file can be downloaded through the following steps:

1. Log into the Open Payments system.

2. On the home page, click "Payments Overview."

3. On the right side of the Payments Overview Page:

    a. Select the type of Payments File; and

    b. Click on "Download .CSV Files" to begin downloading the Zip file. Save the Zip file to your desktop or a preferred location on your hard drive and then open it, rather than opening the file as it downloads.

2.2.4 .CSV Technical Specifications

The technical details of the CSV files are as follows:

1. Field Separator : | (Pipe)

2. Line Separator : \r\n (Return Carriage\New Line)

3. The first record in a CSV file may be a header record containing column (field) names that match the submissions template.

4. Each record is one line.

5. Fields are separated with | (Pipe): Example John|Doe|120 Any Street.|"Anytown, WW"|08123

6. Leading and trailing space-characters adjacent to pipe field separators are ignored. For example, John | Doe | resolves to "John" and "Doe", etc. Space characters can be spaces, or tabs.

7. Fields with embedded pipe must be delimited with double-quote characters. In the above example. "Anytown, WW" had to be delimited in double quotes because it contained an embedded comma.

8. Fields that contain double quote characters must be surrounded by double-quotes, and the embedded double-quotes must each be represented by a pair of consecutive double quotes. For example, John "Da Man" Doe would convert to "John ""Da Man"""|Doe|120 Any Street.

9. Fields with embedded line-breaks are not supported and will be return as errors.

10. Fields may always be delimited with double quotes.

11. The delimiters will always be discarded.

2.2.5 .CSV File Creation for Submission

When entering data in the .CSV files, follow these general guidelines:

1. Open the appropriate file based on the reporting category. Microsoft Excel for Microsoft Windows is recommended for opening .CSV files.

Note: The .CSV files are pipe delimited, not comma delimited. To open and save the pipe-delimited .CSV files from Microsoft Excel in Windows, please ensure you have the list separator as a pipe: "|". This can be done through the following steps:

  a. Click "Start," then select "Settings," then "Control Panel." Click on "Regional and Language Options."

  b. Under "Format" tab, click on the button labeled "Additional settings". Under the "Number" tab, highlight the data in the field labeled "List Separator". Type the pipe delimiter "|" in the field to replace the previous list separator.

  c. Click "OK" on the window titled "Customize Regional Options."

  d. Click "OK" on the window titled "Region and Language Options."

For Macintosh operating systems, it is recommended to use TextEditor to open and edit the files.

2. Enter your submission data in the file. For new submissions, the Resubmission File Indicator must be set to "N."

Note: When entering data in the .CSV files, follow these general guidelines:

a. Do not delete or edit the first line in the file. Deleting this line will result in file validation error.

    i. This line identifies the order in which the data elements will be populated in the .CSV file.

b. Delete any sample data entered in .CSV files starting from line 2 onwards before uploading your entity's submission information to the Open Payments system. Some data elements in the submission files are optional. If you do not intend to enter data for an optional data element, leave that field blank. DO NOT enter spaces, "Not Applicable," "N/A," etc.

c. DO NOT format cells/columns in the file. For dates and dollar amounts, follow the format provided in the Submission Data Mapping Document on the [Data Submission and Attestion page](#) of the Open Payments website.

d. For data elements that allow multiple entries, such as multiple state-licenses numbers etc., separate columns are available for each entry. Use the columns as required and leave the unused cells as blank. DO NOT change the layout of the file.

e. If the file exceeds 250MB in size, please separate the data into multiple submissions to keep the file size under 250 MB.

f. **Save your file!**

    i. When done with entering the data, save the file as a .CSV file.

    ii. The file will be saved as a pipe-delimited .CSV file.

    iii. Please note that the .CSV file name should be unique across submissions and not exceed 50 characters.

2.3 File Upload Instructions

.XML and .CSV files containing payments or transfers of value information cannot be uploaded until the Open Payments system is operational.

Once the system is operational, follow the steps below to upload the completed .XML or .CSV file:

1. Log into the Open Payments system.

2. Navigate to the Home>Payments>Report Payments page.

3. Select "File Upload" as a method to report payments.

4. On the Upload File Page, select the entity, program year, and payment type.

5. Browse to select the appropriate file to upload. Please note that each file will be treated as a separate upload. The file extension must be .XML for .XML files and .CSV for .CSV files.

    a. The file size should not exceed 250MB. If the exceeds 250MB, split it into multiple files to accommodate the 250MB requirement.

6. Click "Upload File."

Upon completion of the file upload, you will receive a successfully uploaded file(s) message on the screen after the successful validation. You will also receive an email indicating if your .XML or .CSV file has been accepted as a valid submission, or if there are validation errors associated with the upload. Records without errors will be accepted into the system. Records with invalid format or additional errors will be rejected. If there are validation errors, you will receive an email describing the errors.

2.4 Review Error Report

After completion of the file upload, you will receive an email notification stating the acceptance of the submission or validation errors that prevented its acceptance. The email will give an error code to explain rejections. Error codes associated with the invalid records will be explained in the email and in the Open Payments system. The error code listing will include the Home System Payment ID and the Open Payments ID to enable the reporting organizing to reconcile with their internal systems. The Open Payments system will also provide the capability to download the error report in a text format to local machines.

Note:

1. The Home System Payment Identifier is an optional data element and is associated with the payment transaction in the applicable manufacturer or applicable GPO home system. It is strongly encouraged that you to include this information during data submission to reconcile the submitted data with your organization's payment transaction.

2. The submitter should make a note of the Open Payments ID, as this will be required to resubmit the payment information.

3. The list of error codes and error descriptions will be available on the CMS Open Payments website in the future.

3   Withdrawing or Deleting Previously Submitted Files

This section provides instructions on how to delete a previously uploaded .XML or .CSV file containing payment or transfers of value.

If the previously submitted files needs to be withdrawn or deleted, the system will provide two options to do so:

- Select all the payment records and delete them from the Open Payments system; or

- Individually select the payment records to delete them from the Open Payments system.

The steps for withdrawing or deleting the previously submitted files are outlined below:

1. Log into the Open Payments system.

2. Navigate to the Home>Payments and Submissions Overview page.

3. Select the organization, program year, and payment type to display all the payment records submitted by the organization for the program year for the selected payment type.

4. On the View Payments page, search by the File ID, Open Payments Payment ID, or Home System Payment ID that needs to deleted.

5. Select all the payment records or individual records to be deleted and click on "Delete Selected."

6. The system will prompt you to confirm if you want to proceed with the delete.

7. Click "Yes" and all the selected records will be deleted.

4   Resubmitting Payment Records

A user can resubmit the payment information due to various reasons, such as to fix validation errors in previously submitted file or correct information on a previously submitted valid payment information. This section provides guidelines on how to resubmit records via file upload.

The Open Payments system will allow the user to resubmit payment information using the .CSV or XML format. Once the user has viewed the invalid records and corresponding error codes, the user will be able to create a new file with corrected records and upload the resubmission file to the Open Payments system. The guidelines listed below must be followed for a successful resubmission of the file:

1. Create a new file following the instructions noted in Section 2.1 and Section 2.2 for the preferred file format. The following information must be included to process the resubmissions:

   a. The Resubmission File Indicator data element must be set to "Y." This identifies that all the information in the file will be resubmitted to Open Payments for processing.

   b. The Resubmitted Payment Record ID must be populated with the Open Payments Payment ID for the payment record being resubmitted.

   c. The Open Payments Payment ID of the record(s) being resubmitted must be provided. Without the Open Payments Payment ID, the system will not be able to process those records. If the file contains a few records with Open Payments Payment ID and few without, the records without Open Payments Payment ID

will be rejected. The system will notify users of the failure via email and via the CMS Open Payments website.

2. Populate the rest of the data elements with your organization's data.

3. Upload the resubmission file using the instructions noted in Section 2.2.

5 Data Mapping Between File Specifications and the .XML Schema/.CSV files

This section provides guidance on how to map the data elements currently found in the Submission File Specifications previously posted, to the .XML Schema and .CSV files.

1. Download the Submission Data Mapping Document from the Data Submission and Attestation page of the Open Payments website. This document identifies the XSD elements and .CSV elements that correspond to each of the data element in the file submission.

If an .XML file is being submitted, please map the file submission specification data element listed in Data Element Name column to the XSD Element Name column. If a .CSV file is being submitted, please map the file submission specification data element listed in Data Element Name column to CSV Element Name column.

Based on the Submission Data Mapping Document, the correct data element on the .XML and .CSV file can be populated with the entity's data.